

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

10-cr-219-WMS-HKS

TONAWANDA COKE CORPORATION,  
et al.,

Defendants.

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**DEFENDANTS' JOINT SUPPLEMENTAL EXPERT WITNESS DISCLOSURE**

Undersigned counsel for Defendants Tonawanda Coke Corporation ("Tonawanda Coke") and Mark L. Kamholz hereby provide this supplemental submission regarding their expert witness disclosure, pursuant to Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure. In addition to the documents listed in the Defendants' Joint Expert Witness Disclosure, filed February 19, 2013 [Docket No. 133], the following documents were considered and relied upon by the Defendants' expert witnesses, Stephen A. Johnson and Marcia E. Williams, in the preparation of their expert opinions.

<b>Bates</b>	<b>Documents Received From Counsel and Relied Upon</b>	<b>Date</b>
TCC-RD-001694-1716	Notes in Tonawanda Coke files regarding June 17, 2009 and September 10, 2009 EPA inspections	2009-06-17
TCC-RD-001690-1693	Letter to Raymond Fisher to Mark Kamholz related to a February 29, 2001 inspection	2001-02-29

<b>Document Provided</b>	<b>Documents Identified by Experts and Relied Upon</b>	<b>Date</b>
TCC-RD-001556-1689	New York Dept. of Environmental Conservation, Addendum to Section E, New York State's Hazardous Waste Management Compliance Enforcement Strategy (received by FOIL from NY)	1989-00-00

DATED: Buffalo, N.Y.  
February 22, 2013

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of February 2013, I electronically filed the foregoing DEFENDANTS' JOINT SUPPLEMENTAL EXPERT WITNESS DISCLOSURE with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following CM/ECF participants on this case:

Aaron J. Mango

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